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*Harrah's Las Vegas, LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KARLA K. KWIST, an individual;  
  
Plaintiff,

v.

HARRAH'S LAS VEGAS, LLC, a Nevada  
limited liability company; DOES 1 through  
10 inclusive; ROE  
CORPORATIONS/ENTITIES 1 through  
10 inclusive,  
  
Defendants.

Case No.: 2:16-cv-00095-JCM-PAL

**STIPULATION AND ORDER TO EXTEND**  
**DEADLINE FOR DEFENDANT TO FILE**  
**RESPONSIVE PLEADING TO COMPLAINT**

Defendant Harrah's Las Vegas, LLC ("Defendant"), by and through its counsel of record, Jackson Lewis P.C., and Plaintiff Karla K. Kwist ("Plaintiff"), by and through her counsel of record, The Thater Law Group, P.C., hereby stipulate and agree to extend the time for Defendant to file a responsive pleading to Plaintiff's Complaint for sixty (60) days, from February 16, 2016 up to and including April 18, 2016.

The parties collectively request this extension for the following reasons:

- On June 5, 2014, Plaintiff dual-filed a charge of discrimination with the Nevada Equal Rights Commission ("NERC") and U.S. Equal Employment Opportunity Commission ("EEOC"). On August 31, 2015, the NERC closed its case. On October 14, 2015, the EEOC issued a right to sue notice, and on January 15, 2016, Plaintiff filed the instant lawsuit (Case 2:16-cv-00095-JCM-PAL).

- On October 29, 2015, Plaintiff dual-filed a new charge of discrimination with the NERC and EEOC, and requested the immediate issuance of a right to sue notice. On February 4, 2016, the NERC closed its case due to Plaintiff's request for an immediate right to sue notice from the EEOC.
- The parties anticipate the EEOC will issue a right to sue notice to Plaintiff within the next 30-45 calendar days.
- Upon receipt, Plaintiff will amend her complaint to include all of her claims against Defendant, specifically those in her new charge.
- Defendant's undersigned counsel has been authorized by Defendant to accept service of Plaintiff's amended complaint (once filed).
- The parties believe it is most efficient for Plaintiff to receive the anticipated right to sue notice from the EEOC and amend her complaint so that the parties can litigate, and Defendant can respond to, all of Plaintiff's claims at once in the present case.
- Thus, the parties are requesting a sixty (60) day extension of the time for Defendant to respond to the current complaint, so that Plaintiff can first obtain the anticipated right to sue from the EEOC and amend her complaint to include all of her claims against Defendant. Thereafter, Defendant's counsel will accept service of the amended complaint and Defendant will file a response to the amended complaint.

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1 This stipulation and order is sought in good faith and not for the purpose of delay. No  
2 prior request for any extension of time has been made.

3 Dated this 16th day of February, 2016.

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5 THE THATER LAW GROUP, P.C.

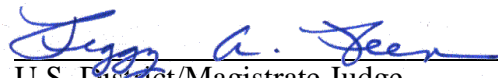
JACKSON LEWIS P.C.

6  
7 /s/ M. Lani Esteban-Trinidad  
8 M. Lani Esteban-Trinidad, Esq., Bar #6967  
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/s/ Deverie J. Christensen  
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Las Vegas, Nevada 89169  
*Attorneys for Defendant*

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11 **ORDER**

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13 IT IS SO ORDERED \_\_\_\_\_ February 26, 2016.

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16 U.S. District/Magistrate Judge

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